

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

JEFFERSON COUNTY COMMISSION;
PATRICIA NOLAND, *as an individual
and behalf of all others similarly situated*;
and DALE MANUEL, *as an individual and
behalf of all others similarly situated*,

Plaintiffs, and

THORNTON COOPER,

Intervening Plaintiff,

v.

Civil Action No. 2:11-CV-989
(KING, BAILEY, BERGER)

NATALIE E. TENNANT, *in her capacity as
the Secretary of State*; EARL RAY TOMBLIN,
*in his capacity as the Chief Executive Officer
of the State of West Virginia*; JEFFREY
KESSLER, *in his capacity as the Acting
President of the Senate of the West Virginia
Legislature*; and RICHARD THOMPSON, *in
his capacity as the Speaker of the House of
Delegates of the West Virginia Legislature*,

Defendants.

NOTICE.

Thornton Cooper, Intervening Plaintiff, *pro se*, hereby notifies the Court and the Counsel for the other parties of (a) the specifics of a fourth congressional redistricting plan that he has developed and (b) the information that he plans to use in computing

the areas of the respective congressional districts as he calculates their Reock compactness scores.

Mr. Cooper is of the opinion that providing this information ten (10) days prior to the evidentiary hearing scheduled for December 27, 2011, in the above-captioned case will be of assistance to the Court and will also assist the other Counsel in preparing for that hearing and in arriving at a joint stipulation.

The specifics of Mr. Cooper's fourth congressional redistricting plan, which splits exactly one county, are set forth in Attachment A to this notice. That attachment includes population figures and a maps (created on the Dave's Redistricting website) relating to each congressional district under that plan, as well as population figures and maps from the United States Census Bureau with respect to the county (Taylor County) that would be split under this plan.

The areas of the various counties, from page 1060 of the 2007 edition of the **West Virginia Blue Book**, are set forth in Attachment B to this notice.

THORNTON COOPER

Intervening Plaintiff

Pro Se

/s/ Thornton Cooper
Thornton Cooper (WVSB No. 823)
3015 Ridgeview Drive
South Charleston, WV 25303
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Dated: December 17, 2011

West Virginia Congressional Redistricting Plan: Cooper Plan No. 4:**CONGRESSIONAL DISTRICT 1:**

Berkeley	104,169
Brooke	24,069
Grant	11,937
Hampshire	23,964
Hancock	30,676
Hardy	14,025
Jefferson	53,498
Marion	56,418
Marshall	33,107
Mineral	28,212
Monongalia	96,189
Morgan	17,541
Ohio	44,443
Pleasants	7,605
Preston	33,520

ATTACHMENT A
To Intervening Plaintiff Thornton
Cooper' Notice in
Civil Action No. 2:11-CV-989

Taylor County Voting District 3	1,108
Taylor County Voting District 9	538
Taylor County Voting District 10	1,411
Taylor County Voting District 11	266
Taylor County Voting District 12	956
Taylor County Voting District 14	1,079
(Subtotal for part of Taylor County)	5,358

Taylor (part)	5,358
Tucker	7,141
Tyler	9,208
Wetzel	16,583
Total	617,663

CONGRESSIONAL DISTRICT 2:

Boone	24,629
Cabell	96,319
Clay	9,386
Jackson	29,211
Kanawha	193,063
Lincoln	21,720
Mason	27,324
Putnam	55,486
Ritchie	10,449
Roane	14,926
Wayne	42,481
Wirt	5,717
Wood	86,956

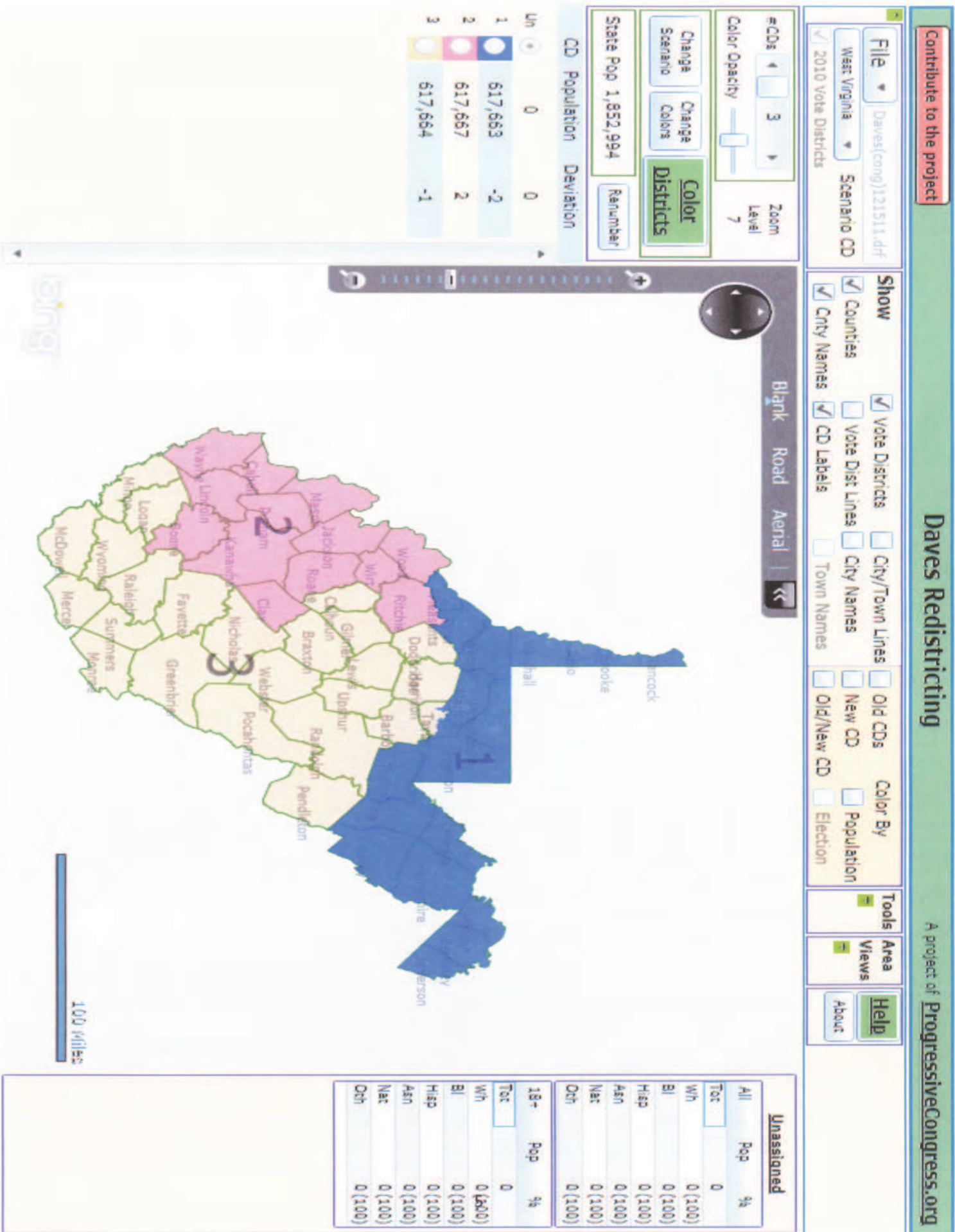
Total	617,667
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CONGRESSIONAL DISTRICT 3:

Barbour	16,589
Braxton	14,523
Calhoun	7,627
Doddridge	8,202
Fayette	46,039
Gilmer	8,693
Greenbrier	35,480
Harrison	69,099
Lewis	16,372
Logan	36,743
McDowell	22,113
Mercer	62,264
Mingo	26,839
Monroe	13,502
Nicholas	26,233
Pendleton	7,695
Pocahontas	8,719
Raleigh	78,859
Randolph	29,405
Summers	13,927

Taylor County Voting District 1	2,214
Taylor County Voting District 2	1,202
Taylor County Voting District 4	968
Taylor County Voting District 6	427
Taylor County Voting District 17	1,084
Taylor County Voting District 19	1,201
Taylor County Voting District 23	570
Taylor County Voting District 25	726
Taylor County Voting District 26	502
Taylor County Voting District 29	314
Taylor County Voting District 31	1,051
Taylor County Voting District 36	1,278
(Subtotal for part of Taylor County)	11,537

Taylor (part)	11,537
Upshur	24,254
Webster	9,154
Wyoming	23,796
Total	617,664



Contribute to the project

Daves Redistricting

A project of ProgressiveCongress.org

File

West Virginia

Scenario CD

2010 Vote Districts

Show

☒ Counties
 ☒ Vote Districts
 ☐ City/Town Lines
 ☐ Old CDs

Color By

Population

☒ City Names
 ☒ Vote Dist Lines
 ☐ City Names
 ☐ New CD
 ☐ Old/New CD
 ☐ Election

Tools

Area

Views

Help

About

#CDs

3

Zoom Level

11

Color Opacity

Change Scenario

Change Colors

Color Districts

State Pop 1,852,994

Renumber

CD Population Deviation

Un	0	0
1	617,663	-2
2	617,667	2
3	617,664	-1

Blank

Road

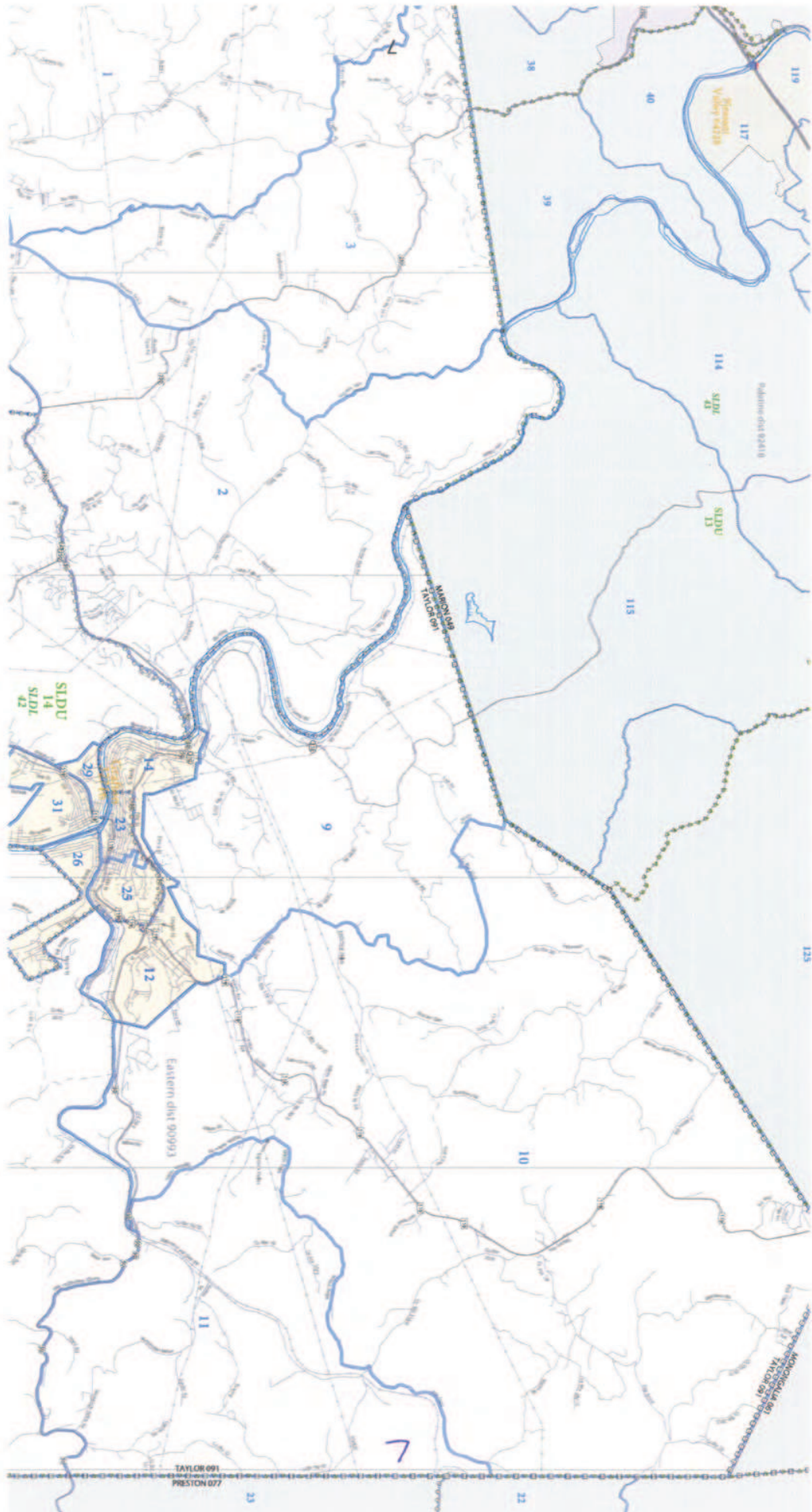
Aerial

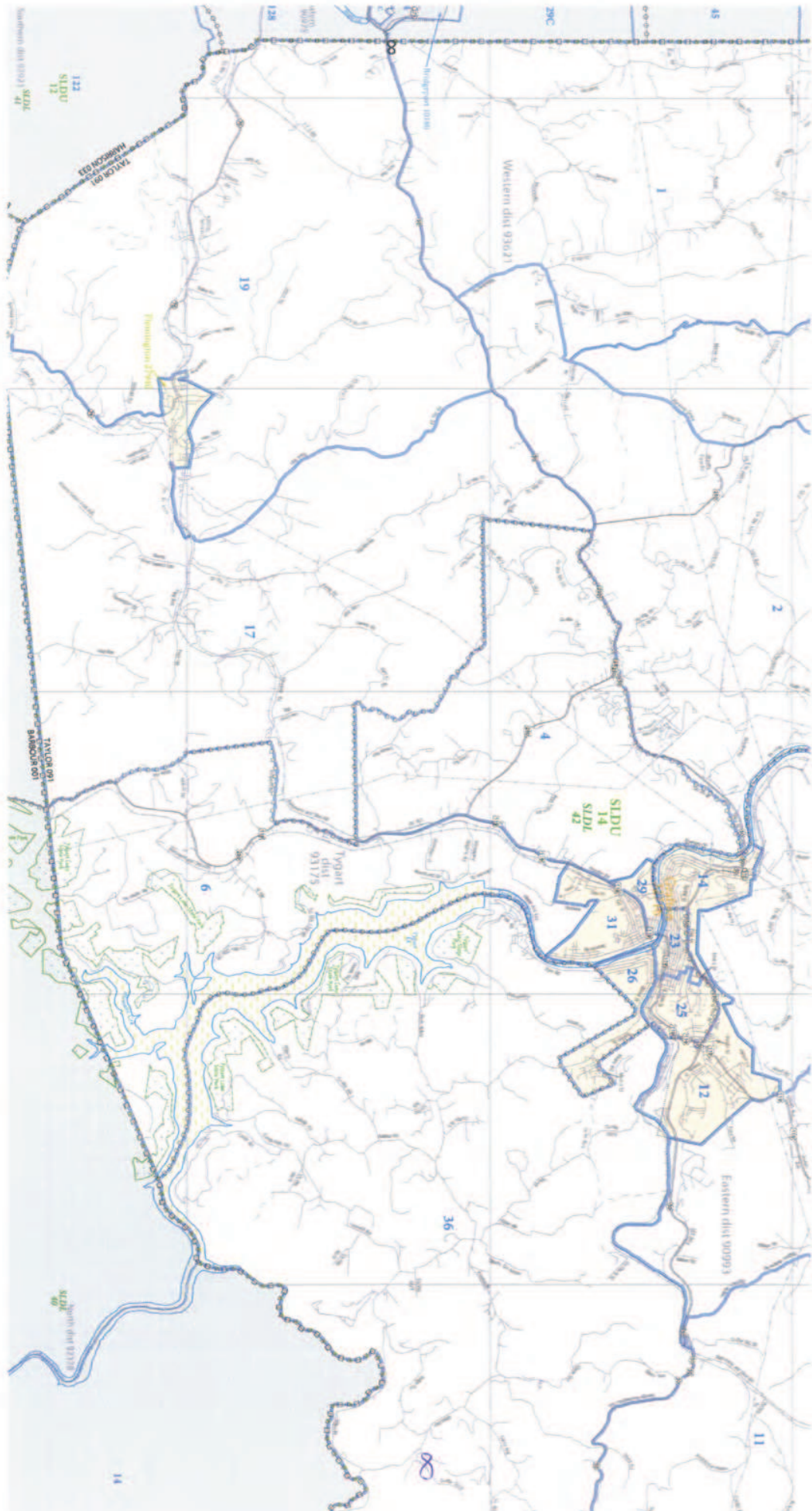
5 miles

Unassigned

All	Pop	%
Tot	0	
Wh	0 (100)	
Bl	0 (100)	
Hisp	0 (100)	
Asn	0 (100)	
Nac	0 (100)	
Oct	0 (100)	

18+	Pop	%
Tot	0	
Wh	0 (100)	
Bl	0 (100)	
Hisp	0 (100)	
Asn	0 (100)	
Nac	0 (100)	
Oct	0 (100)	





ATTACHMENT B
To Intervening Plaintiff Thornton
Cooper' Notice in
Civil Action No. 2-11-CV-989

1060

WEST VIRGINIA BLUE BOOK

	Feet
Ripley	616
Romney	800
Sago	1,463
Saint Albans	598
Saint Marys	620
Sand Fork	745
Shepherdstown	405
Sistersville	640
Smithburg	797
South Charleston	700
Spencer	749
Summersville	1,920
Sutton	940
Terra Alta	2,559
Thomas	3,100
Union	2,071

	Feet
War	1,355
Wardensville	1,011
Wayne	708
Webster Springs	1,480
Weirton	660
Welch	1,306
Wellsburg	660
West Hamlin	590
Weston	1,023
Westover	820
West Union	785
Wheeling	673
White Sulphur Springs	1,980
Whitesville	840
Williamson	720
Williamstown	620
Winfield	589

AREA OF WEST VIRGINIA BY COUNTIES*

(Compiled from data furnished by West Virginia Geological and Economic Survey)

County	Square Miles	County	Square Miles
Barbour	342.9	Mingo	423.9
Berkeley	321.8	Monongalia	365.8
Boone	503.2	Monroe	473.5
Braxton	516.7	Morgan	229.6
Brooke	92.8	Nicholas	654.1
Cabell	288.1	Ohio	108.9
Calhoun	280.4	Pendleton	698.1
Clay	346.4	Pleasants	134.6
Doddridge	320.6	Pocahontas	941.6
Fayette	668.7	Preston	651.4
Gilmer	339.7	Putnam	350.3
Grant	480.3	Raleigh	608.9
Greenbrier	1,024.8	Randolph	1,040.0
Hampshire	644.5	Ritchie	453.7
Hancock	88.2	Roane	484.0
Hardy	584.6	Summers	367.6
Harrison	416.6	Taylor	175.6
Jackson	471.2	Tucker	421.0
Jefferson	211.6	Tyler	260.7
Kanawha	908.4	Upshur	354.7
Lewis	389.5	Wayne	512.3
Lincoln	439.0	Webster	556.2
Logan	455.6	Wetzel	361.3
McDowell	535.0	Wirt	235.1
Marion	311.6	Wood	377.0
Marshall	311.8	Wyoming	501.9
Mason	445.2	TOTAL AREA	24,231.4
Mercer	420.8		
Mineral	329.3		

*Includes water area.

GEOGRA

The geographical center of
County, 4 1/4 miles southeast of
dinates for the center are: 80

SOURCES

(Compiled from data

Formed by the junction of
with Ohio at Kenova, Wayne

Formed by the junction of
River at Point Marion, Penn

Formed by the junction of
ty. Mouth, junction with Ka

Formed in western part
Fork. Mouth, junction with

Formed in western part
Mouth, junction with New

Formed in northern part
junction with New River at

Formed in southern part
Mouth, junction with Ohio

Formed by the junction
Mouth, junction with Ohio

Source in southern part
County.

Formed by the junction
the Allegheny River at Pi

Source in southern part
with Gauley River in Fay

Formed by the junction
Mouth, junction with Mi

Source in the southeast
County.

Formed by the junction
Mouth, Chesapeake Bay.

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FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
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JEFFERSON COUNTY COMMISSION;
PATRICIA NOLAND, *as an individual
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President of the Senate of the West Virginia
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his capacity as the Speaker of the House of
Delegates of the West Virginia Legislature*,

Defendants.

CERTIFICATE OF SERVICE.

I, Thornton Cooper, Intervening Plaintiff, do hereby certify that on December 17, 2011, I electronically filed the foregoing **NOTICE** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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